

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Shamar Dayshaun Franklin

Case: 4:25-mj-30387

Judge Curtis Ivy, Jr.

Filed : 6/13/2025

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2025 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Possession of a firearm as a convicted felon

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.


Complainant's signature

Special Agent Nathan Sutara-ATF

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 13, 2025City and state: Flint, Michigan



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Nathan Sutara, being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since May 2018. I am currently assigned to the Detroit, Michigan Field Division, Flint Field Office. As an ATF agent, I am tasked with investigating criminal violations involving firearms, narcotics and violent crime offenses including violations of Title 18 and Title 21 of the United States Code. Before working with ATF, I was employed by the Michigan Department of State Police (MSP) for approximately five years. I held several positions with MSP, including Detective/Trooper with the Major Case Unit in Saginaw, Michigan. During this employment, I investigated numerous incidents involving violations of state and federal firearms laws, robberies, shootings, and homicides, as well as narcotics trafficking.

2. I make this affidavit based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of documents, and information gained through my training and experience. The information outlined below is provided

for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Based on the facts below, there is probable cause to believe that on June 11, 2025, Shamar Dayshaun Franklin violated 18 U.S.C. § 922(g)(1), possession of a firearm as a convicted felon.

BACKGROUND

4. On June 11, 2025, police were dispatched to a townhouse complex in Flint, Michigan in response to 911 call reporting a person with a gun and shots fired. I know that this location is within the Eastern District of Michigan.

5. 911 dispatchers told the responding officers that individuals in a blue Dodge pickup truck were shooting at unknown subjects.

6. Upon arrival to the scene, Michigan State Police Troopers observed the suspect vehicle, a blue in color Dodge pickup truck, occupied by two individuals. As Troopers approached the vehicle, the driver, described as a black male wearing a white shirt and black shorts, exited the vehicle and began walking away. Police ordered the driver to return to the vehicle, but he refused. Police saw the driver enter a nearby townhouse.

7. Police made contact with the front seat passenger. As they spoke with the front seat passenger, they observed a firearm on the driver's seat. Police seized the firearm which was a Glock, model 29, 10mm pistol bearing S/N: VNR480.

This pistol had a red grip on the handle. See the below photograph:



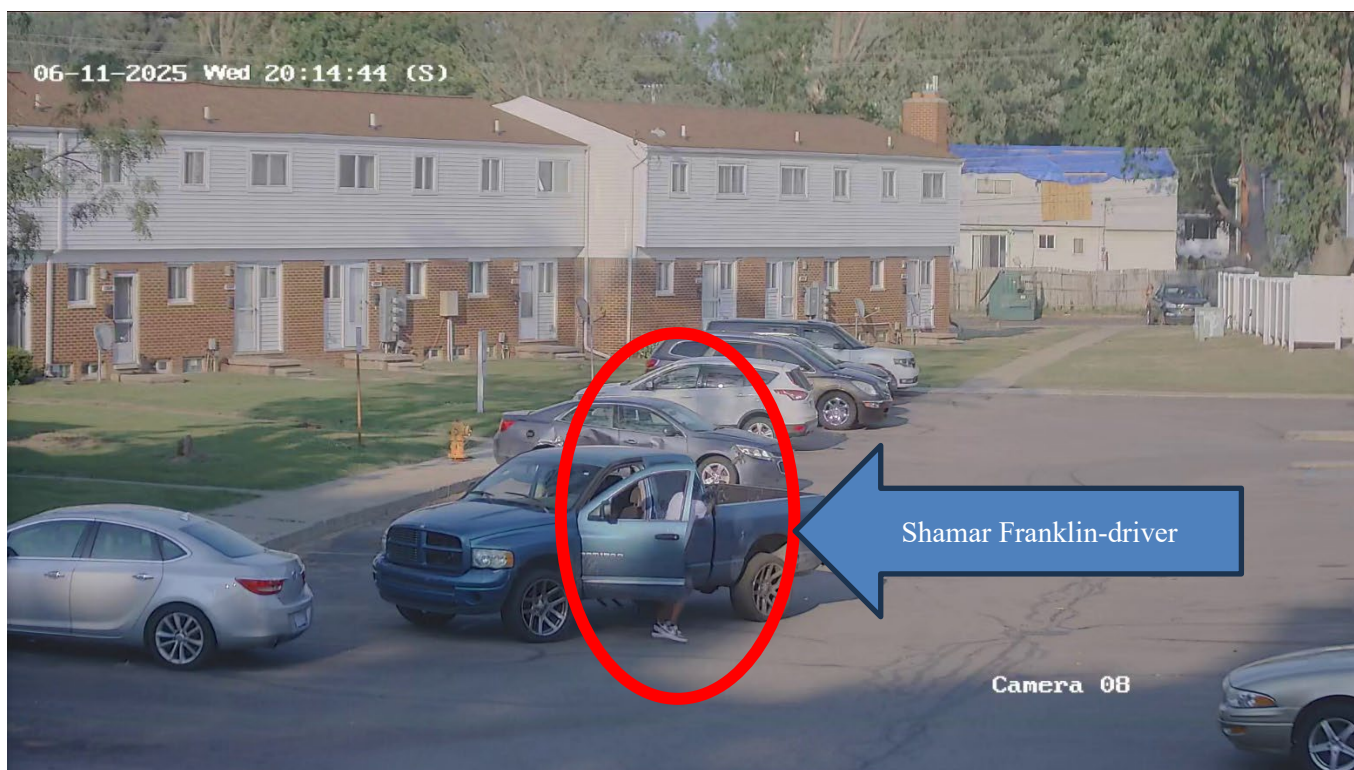
8. I have spoken with Special Agent Dustin Hurt who has received specialized training regarding the manufacture and shipping of firearms. S/A Hurt stated that the aforementioned firearm was manufactured outside the state of Michigan.

9. The passenger told police that he did not possess a gun.

10. Police located and arrested Shamar Franklin in a nearby townhouse after Franklin fell through the ceiling. The townhouse where Franklin fell through the ceiling shares an attic with the townhouse that officers saw the driver of the Dodge pickup entered. When police arrested him, Franklin was wearing a white shirt and black shorts.

11. Police advised Franklin of his Miranda rights. Franklin told officers that he knew he was a felon and prohibited from possessing firearms. He denied having a gun, but admitted he cleaned the Glock that was recovered in the Dodge pickup.

12. I have reviewed surveillance video from the shooting. It depicts a blue Dodge pickup truck pull into the lot of a townhouse complex. The driver, wearing black shorts and a white shirt identified as Shamar Franklin (and circled in red below), exits the driver seat and shoots a pistol.



13. Other surveillance video shows the driver in black shorts and a white t-shirt (Shamar Franklin) possess a black object containing something red, within his waistband:



14. The red located on the object appears to match the red grip on the Glock pistol that was found on the driver seat, where Franklin was seated prior to evading police. Additionally, the magazine of the firearm located is longer than the handle of the firearm, and would extended beyond the bottom of the handle. The black extended magazine is consistent with the object in Franklin's waistband.

15. I conducted a criminal history query into Alward. At that time, I noted the following felony convictions:

- 2024-Felony Police Officer-Fleeing-Third Degree
 - 7th Circuit Court CFN: 24-53352
- 2024-Felony-Police Officer Assaulting./Resisting/Obstructing
 - 7th Circuit Court CFN: 24-53352
- Franklin is currently on Probation through Genesee County MDOC for these offenses.

CONCLUSION

16. Based on the above information, I have probable cause that on June 11, 2025, Shamar Dayshaun Franklin, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Nathan Sutara
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means on June 13, 2025.



Hon. Curtis Ivy, Jr.,
United States Magistrate Judge